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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DOUGLAS JOHNSON MADSEN,

Defendant.

MOTION FOR ORDER
OF FORFEITURE

Case No. 2:15CR00207 DB

Judge Dee Benson

Pursuant to Fed R. Crim. P. Rule 32.2(b), the United States of America respectfully submits this Motion for Order of Forfeiture. In support of this motion, the government states:

1. On April 21, 2015, a Felony Information was entered with the court charging Douglas Johnson Madsen with Receipt of Child Pornography, in violation of 18 U.S.C. § 2252A(a)(2) and (b), (Count I).
2. The Court's jurisdiction in this matter is founded in 28 U.S.C. §1355. The United States sought forfeiture pursuant to 18 U.S.C. § 2253(a)(3).
3. On October 28, 2015, the defendant, Douglas Johnson Madsen, pleaded guilty to Receipt of Child Pornography (Count I) of the Felony Information. As a result of the plea of guilty to Count I of the Information, the defendant Douglas Johnson Madsen must forfeit to the United States all property, real or personal, that is derived from, used, or intended to be used in violation of 18 U.S.C. § 2252A(a)(2) and (b), including but not limited to:

- Seagate Free Agent hard drive 1500GB, serial number: 2GEY290A
- Seagate Backup Plus desktop drive 3TB, model SRO05O0
- Western Digital hard drive 200 GB, serial number: WMAEH2280305
- Maxtor hard drive, serial number: L41DK3PH
- Seagate external hard drive, serial number: NA1LHSX5
- Custom computer tower – Geek Box

4. Forfeiture of the above-identified property pursuant to 18 U.S.C. § 2253(a)(3) is appropriate based on the evidence presented on the Felony Information filed on April 21, 2015, and the Statement in Advance of Plea filed on October 28, 2015. The United States has established the requisite nexus between the property and the offenses.

5. In accordance with the provisions of Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States requests that it be permitted to undertake whatever discovery is necessary to identify, locate, or dispose of property subject to forfeiture.

WHEREFORE, the United States respectfully requests that this Court enter an Order of Forfeiture, forfeiting to the United States the property described herein and in the Felony Information, and order the Bureau of Immigration and Customs Enforcement to maintain custody of the forfeited property in accordance with the law.

Dated this 4th day of November, 2015.

JOHN W. HUBER
United States Attorney

/s/ Tyler L. Murray
Tyler L. Murray
Assistant U.S. Attorney